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6 Attorneys for Defendant
JULIO SANDOVAL
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 JULIO SANDOVAL,

15 Defendant.
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Case No. 1:22-cr-00233-JCC

**MOTION FOR TRAVEL ASSISTANCE;
[PROPOSED] ORDER**

18 JULIO SANDOVAL, through his undersigned counsel, hereby moves this Court for an
19 order directing the United States Marshal to furnish Mr. Sandoval with the cost of travel from
20 Batesville, Arkansas, to Fresno, California, so that he may attend court in Fresno all proceedings
21 related to his upcoming trial scheduled on December 3, 2025. This request has been granted on
22 three prior occasions. ECF Dckt. # 89, 104, 170.

23 Pursuant to 18 U.S.C. § 4285, a judge may direct the United States Marshal to assist an
24 out-of-custody defendant with the cost of traveling to a required court appearance. *See* 18 U.S.C.
25 § 4285. Prior to making such an order, the judge must first make a finding that the defendant is
26 financially unable to provide transportation on their own and that the interests of justice would
27 be served by requiring the United States Marshal to assist with transportation costs. *Id.* If the
28 judge makes the required findings, the United States Marshal must either arrange for the

1 defendant's transportation or furnish the cost of transportation and, additionally, furnish the
2 defendant with subsistence expenses incurred in traveling to the court appearance. *Id.*

3 In this case, Mr. Sandoval, who is out of custody, has a trial in Fresno on December 3,
4 2025, at 9:00 a.m. Mr. Sandoval lives in Arkansas. Mr. Sandoval currently is employed at a Ford
5 Dealership, where he works on car transmissions; in that capacity he makes approximately \$4000
6 per month. Mr. Sandoval does not have any significant savings. Moreover, Mr. Sandoval has a
7 very large family that he is financially responsible for. In total he has 9 children, 6 of which are
8 under the age of 18. Mr. Sandoval has many recurring monthly payments. His car payment,
9 phone bill, internet bill and weekly groceries account for nearly all of his earnings. Mr. Sandoval
10 is "financially unable to provide the necessary transportation to appear before the required court
11 on [his] own" under § 4285. In light of the circumstances set forth in the attached declaration
12 regarding Mr. Sandoval's current financial circumstances, Mr. Sandoval requests that the Court
13 make the required findings under 18 U.S.C. § 4285 and direct the United States Marshal to pay
14 his travel and subsistence expenses so he may attend court in Fresno on all matters where he is
15 ordered to appear related to his December 3, 2025 trial.

16
17 Respectfully submitted,

18 HEATHER E. WILLIAMS
19 Federal Defender

20 Dated: October 31, 2025

21 /s/ Griffin Estes
22 GRIFFIN ESTES
23 Assistant Federal Defender
24 Attorney for Defendant
25 JULIO SANDOVAL
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ORDER

Pursuant to 18 U.S.C. § 4285, the Court directs the United States Marshal to either arrange transportation or furnish JULIO SANDOVAL with the cost of travel from Batesville, Arkansas, to Fresno, California, so that he may attend all court proceedings in Fresno related to his December 3~~October~~ 7, 2025, trial. Additionally, the United States Marshal shall provide Mr. Sandoval with subsistence expenses for this travel period not to exceed the amount authorized as per diem allowance for travel under 5 U.S.C. § 5702(a).

Dated: October 31, 2025



HON. JOHN C. COUGHENOUR
United States District Judge

DECLARATION OF GRIFFIN ESTES

I, Griffin Estes, declare as follows:

1. I am an attorney admitted to practice before this Court and am employed as an Assistant Federal Defender.

2. The Federal Defender has been appointed to represent Defendant Julio Sandoval in the above-entitled case, and I have been assigned to represent him.

3. Based on my representation with Mr. Sandoval, I am aware of Mr. Sandoval's personal financial circumstances. Mr. Sandoval currently lives in Batesville, Arkansas. He works at Riser Harness Ford in Searcy, Arkansas. He works on commission. Based on my conversations with him, I am aware of his monthly income and expenses. His wife is a homemaker and is currently not formally employed. Together they have 6 children under the age of 18. Moreover, Mr. Sandoval is expecting another child. Mr. Sandoval is the sole financial provider for his family. Mr. Sandoval is unable to afford the expenses associated with traveling to Court and paying for his lodgings during the proceedings.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 31, 2025, at Fresno, California.

/s/ Griffin Estes
GRIFFIN ESTES, Declarant